

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Comments on Westlake Vinyl's Marshall County facility Draft Title V Air Quality Permit submitted by Kevin P. Sheridan, Westlake Vinyls Inc Manager - HSE.

Preliminary Permit Determination

1. On the first page of the Preliminary Permit Determination title page (listing the attachments) only "Alkalies and Chlorine Manufacturing" is identified. Westlake respectfully requests that "Industrial Organic Chemical Manufacturing" also be added to accurately address the manufacturing facilities covered by permit V-05-011.

Division's response: Comment acknowledged, change made.

Permit Statement of Basis

2. On page 18 of 18 for "EU#009 (EPN 524)", Westlake respectfully requests the description be changed to "Vinyl Chloride Flare". Also, the alternate operating scenario (40 CFR 61.65(d)(2)(i)), as reference on page 90 of 117, is omitted from this discussion. Westlake also, respectfully requests it be made clear that either i.(Method 9 observation), ii. (smoke observations listed), **or** iii. (alternate operating scenario) can be performed to demonstrate compliance. This is most easily accomplished by changing the last sentence (before the monitoring methods) to "If visible emissions are observed, the permittee shall perform **one of** the following:" Westlake believes that it is unnecessary to require both the Method 9 readings (i.) and the flare observations (ii.). The permit for which this renewal is taking the place, required either (not both) of these options.

Division's response: The Division acknowledges the comments. On page 18 of the Statement of Basis, the description for EU#009 (EPN 524) has been changed to "Vinyl Chloride Flare" as suggested. The alternate operating scenario (40 CFR 61.65(d)(2)(i)), as referenced on page 89 of 116 of the permit, was added to page 18 of the statement of basis.

*The Division acknowledges Westlake's suggested language stating "If visible emissions are observed, the permittee shall perform **one of** the following". However this language will not be incorporated into the permit. On page 89 of the permit, under **5. Specific Recordkeeping Requirements**, and on page 18 of the Statement of Basis, "Method 9" was changed to "Method 22". This was an inadvertent mistake which has been corrected by the Division. In order to demonstrate compliance with 401 KAR 63:015, the Division will require Westlake to perform Method 22 readings if visible emissions are observed, as stated in the revised paragraph "a" on page 89 of the permit and page 18 of the revised Statement of Basis.*

Title V Permit

3. Throughout the permit (page 5, 15, 85) regarding indirect heat exchangers, the “Compliance Demonstration Method” for the “Emission Limitations:” is listed as “Compliance with the particulate matter (lb/mmBtu), the sulfur dioxide limit (lb/mmBtu), and the opacity limit is demonstrated while burning process fuel gas.”. As a matter of clarification, Westlake respectfully requests confirmation that this statement is equivalent to “As long as process fuel gas is used as the fuel for these units, the particulate matter, sulfur dioxide, and opacity emissions are assumed to be less than the listed limits, and therefore in compliance with the emission limitations”.

Division’s response: The Division acknowledges the comment and confirms that as long as process fuel gas is used as the fuel for these units, the particulate matter, sulfur dioxide, and opacity emissions will be less than the listed limits, and therefore in compliance with the emission limitations – unless otherwise indicated by testing or recordkeeping. The permit states “Compliance with the particulate matter limit (lb/mmBtu), the sulfur dioxide limit (lb/mmBtu), and the opacity limit is demonstrated while burning process fuel gas.” No changes were made to the permit as a result of this comment.

4. Throughout the permit (page 6, 15, 46) regarding indirect heat exchangers, the “Specific Monitoring Requirements:” states that “The rate of fuel burned shall be measured daily or at shorter intervals and recorded. The heating value and ash content of fuel shall be ascertained at least once per week and recorded [401 KAR 61:015, Section 6(3)]. Compliance with 401 KAR 61:015 can be demonstrated by monthly measurements and records of fuel burned”. As a matter of clarification, Westlake respectfully requests confirmation that based on the requirements cited above, only monthly measurements of the quantity of fuel burned and monthly records of the type (gaseous) of fuel burned is required.

Division’s response: The Division acknowledges the comment and confirms that monthly measurements and records of fuel burned can be used to demonstrate compliance with 401 KAR 61:015. No changes were made to the permit as a result of this comment.

5. Page 15 of 117, EPN 305-311 and 327-328, “4. Specific Monitoring Requirements:”, the phrase “of fuel burned” is repeated unnecessarily. Westlake respectfully requests this minor typographical error be corrected.

Division’s response: The Division acknowledges the comment. The permit was corrected as suggested.

6. Page 19 of 117, EPN 319 & 320, “6. Specific Reporting Requirements:”, subsection b. Westlake respectfully requests correction of the last sentence as follows: “If the inspection is not planned and the permittee could not have known about the inspection 30 calendar days...”

Division’s response: The Division acknowledges the comment. The permit was revised as suggested.

7. Page 38 of 117, EPN 342, “5. Specific Recordkeeping Requirements:”, subsection a. Westlake respectfully requests correction of the last sentence as follows: “If visible emissions are observed, the permittee shall perform one of the following:” Westlake believes that it is unnecessary to require both the Method 9 readings (i.) and the flare observations (ii.). The permit for which this renewal is taking the place, required either (not both) of these options.

*Division’s response: The Division acknowledges Westlake’s suggested language stating “If visible emissions are observed, the permittee shall perform one of the following”. However this language will not be incorporated into the permit. On page 38 of the permit, under 5. **Specific Recordkeeping Requirements**, “Method 9” was changed to “Method 22”. This was an inadvertent mistake which has been corrected by the Division. In order to demonstrate compliance with 401 KAR 63:015, the Division will require Westlake to perform Method 22 readings if visible emissions are observed, as stated in the revised paragraph “a” on page 38 of the permit.*

8. Page 81 of 117, EPN 453 & 530, “3. Testing Requirements:” requires a re-test of the incinerators within 180 days following final issuance of the permit. Due to short-term uncertainty, seasonally fluctuating market conditions and the necessity to perform the testing at maximum operating rates, Westlake respectfully requests 1 calendar year in lieu of the 180 days in order to coordinate and perform the required testing.

Division’s response: The Division acknowledges the comments and revised the permit on page 81 such that retesting must be performed within one calendar year following final issuance of the permit.

9. Page 87 of 117, EPN 519, 520 & 521, “2. Emission Limitations:”. The compliance demonstration method makes a reference to “manufacturer’s specifications”. These units are of local original design and no such manufacturer’s specifications exist. Westlake requests that “manufacturer’s specifications and/or” be deleted, leaving only “standard operating procedures”.

Division’s response: The Division acknowledges the comment. The permit was revised as suggested.

10. Page 89 of 117, EPN 524, “5. Specific Recordkeeping Requirements:” Subsection “a.” states, “If visible emissions are observed, the permittee shall perform the following:” Westlake believes that it is unnecessary to require both the Method 9 readings (i.) and the flare observations (ii.). The permit for which this renewal is taking the place, required either (not both) of these options. Westlake respectfully requests the last sentence to be changes to “If visible emissions are observed, the permittee shall perform one of the following:”

*Division’s response: The Division acknowledges Westlake’s suggested language stating “If visible emissions are observed, the permittee shall perform one of the following”. However this language will not be incorporated into the permit. On page 89 of the permit, under 5. **Specific Recordkeeping Requirements**, “Method 9” was changed to “Method 22”. This was an inadvertent mistake which has been corrected by the Division. In order to demonstrate compliance with 401 KAR 63:015, the Division will require Westlake to perform Method 22 readings if visible emissions are observed, as stated in the revised paragraph “a” on page 89 of the permit.*

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.